

# PUBLIC SUBMISSION

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Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0478

Comment submitted by Thomas D. Fleury, Executive Vice President, Cityline Partners

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## Submitter Information

**Submitter's Representative:** Thomas D Fleury, Executive VP

**Organization:** Cityline Partners

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## General Comment

To whom it may concern:

My name is Thomas D Fleury, EVP, Cityline Partners a Tysons Corner, Fairfax County, VA real estate developer with almost 40 years experience .

We respectfully request that you delay any action on adoption and implementation of TMLD measures for the Chesapeake Bay until 12/31/13 based on the following rationale:

- 1) This process is moving too fast for a meaningful dialog, and taking on the appearance of a "rail road " job. More time is needed .
- 2) The model being used is at best flawed, and at worse gives the appearance of being artificially manipulated. The correlation between urban redevelopment non point polution and rural farming non point is , even to a layman, illogical.
- 3) EPA has not even attempted a cost benefit analysis .
- 4) No one has looked at lower cost alternatives such as rain gardens and porous paving. The new Tysons Master Plan shows multiple mitigation measures that accomplish detention and water quality features in itsa 20 year plan for almost 45 million sq ft of new development that hasnt even been considered through this fast track process.
- 5) Why the rush to yet another unfunded federal mandate while we atre working our way out of the worse real esatate market since the Great Depression. This is kicking a man while he is down, and with limited funds and manpower, the real estate industry is currently ill equipped to stave off these measures, and need s more time to present its plausible alternatives.

Please delay adoption and implementation for the sake of smarter and more effective dialog with the most economically effected parties

Very truley your,

Thomas D. Fleury Executive VP

Cityline Partners

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